

UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In re) Case No. _____
)
) **Notice of Motion**
) **For Avoidance of Lien**
) **Pursuant to 11 U.S.C. § 522(f)**
)
Debtor(s))

The attached motion was filed on behalf of the debtor(s) to avoid a lien pursuant to 11 U.S.C. § 522(f). The name and address of the debtor(s)' attorney (or debtor(s), if no attorney) are:

If you wish to resist the motion you must, within 14 days of the service date shown below, file the following with the clerk at 1050 SW 6th Ave. #700, Portland OR 97204 or 405 E 8th Ave. #2600, Eugene OR 97401:

- 1) a written objection, setting forth the specific grounds for the objection; and
- 2) a certificate showing the response has been served on the person named above.

If no timely response is filed, the court may sign an order submitted by the debtor(s) granting the motion.

Certificate of Service

Note: Service must be made pursuant to Federal Rule of Bankruptcy Procedure 7004 (e.g., 7004(b)(3) for corporations and 7004(h) for insured depository institutions).

I certify on _____ this notice, the motion, and [LBF 717.15](#) if this notice was served on paper, were served on the trustee, U.S. Trustee, and all other parties named in the motion, whose names and addresses are listed below:

Signature

OSB # (if attorney)

Debtor(s) address (if not provided above) and last 4 digits of Taxpayer ID #

717 (12/1/2018)

UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In re) Case No. _____
)
) MOTION TO AVOID JUDICIAL LIEN ON
) REAL PROPERTY PURSUANT TO
Debtor(s)) 11 U.S.C. § 522(f)(1)(A)

Pursuant to 11 U.S.C. § 522(f)(1)(A), Debtor moves to avoid a judicial lien on real property referenced below, and alleges as follows:

1. Name and address of lienholder whose lien is to be avoided:

2. The nature of the judicial lien and the date upon which the lien was obtained (include case name, number, county, state, date in which judgment was docketed, and transcription information, if appropriate):

3. Description and address (attach exhibit if necessary) of real property to which judicial lien attaches:

4. Date petition filed: _____

5. Fair market value of real property as of petition date: \$_____ (debtor's 1/2 interest)

6. Name(s) and amount(s) of all senior lienholder(s):

7. Present balance owing to senior lienholder(s) plus junior consensual liens on petition date excluding any precomputed interest or other unearned charges: \$_____.

8. The description of nature and amount of exemptions impaired:

9. Other facts relevant in determining whether Motion should be granted:

10. In light of the foregoing, and pursuant to 11 U.S.C. § 522(f)(1)(A), debtor is entitled to avoid the lien referenced above _____ in full so that it no longer remains a lien against debtor's real property or in the amount of \$ _____ so that it remains a lien against debtor's real property in the amount of \$ _____.

Debtor's or Debtor's Attorney's Signature OSB #

Address

Telephone Number